

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

LYNNE FREEMAN,

Plaintiff,

v.

TRACY DEEBE-ELKENANEY P/K/A TRACY
WOLFF, et al.,

Defendants.

Case No. 1:22-cv-02435-LLS-SN

**DECLARATION OF STEPHEN M.
DONIGER IN OPPOSITION TO
DEFENDANTS' *DAUBERT* MOTION TO
EXCLUDE PLAINTIFF'S LIABILITY
EXPERTS**

DECLARATION OF STEPHEN M. DONIGER

I, Stephen M. Doniger, hereby declare as follows:

1. I am above eighteen (18) years of age, am counsel of record in this case for Plaintiff Lynne Freeman and am competent to give the testimony set forth below. Said testimony is given from my own personal knowledge except where otherwise indicated. If called as a witness, I could and would competently testify as set forth below.
2. Attached hereto as **Exhibit 1** is a true and correct copy of the Curriculum Vitae of Dr. Patrick Juola that was provided concurrent with his initial report in this case.
3. Attached hereto as **Exhibit 2** is a true and correct copy of the relevant pages of Dr. Juola's deposition taken in this case.
4. Attached hereto as **Exhibit 3** is a true and correct copy of the relevant pages of Dr. Carole Chaski's deposition taken in this case.

I declare under penalty of perjury and the laws of the United States of America that the foregoing is true and correct.

Executed on February 28, 2024 in Los Angeles, California.

By: /s/ Stephen Doniger
Stephen M. Doniger
Declarant